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November 4, 2022

Via ECF

Honorable Valerie Figueredo
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *John Doe v. City of New York and N.Y.C. Health and Hospitals Corp.*
20-CV-6393 (PAE) (VF)

Dear Judge Figueredo:

I am an Assistant Corporation Counsel (“ACC”) assigned to represent Defendants/Third-Party Plaintiffs the City of New York (the “City”) and New York City Health + Hospitals (“H+H”) in the above-referenced action, in which Plaintiff alleges that he was the victim of a sexual assault by a physical therapist that occurred at Rikers Island, where Plaintiff was a detainee, on May 30, 2019. I write to respectfully request a 30-day extension of time to file Defendants’/Third-Party Plaintiffs’ Proposed Findings of Fact and Conclusions of Law pursuant to the Court’s Order, dated October 4, 2022. (Dkt. No. 70).

The primary reason for the 30-day extension is due to professional obligations in this matter, as well as other matters, including depositions, hearings, and discovery obligations, which have impacted my office’s ability to prepare and finalize the Proposed Findings of Fact and Conclusions of Law. This is the Defendants’/Third-Party Plaintiffs’ first request for an extension of time to file the Proposed Findings of Fact and Conclusions of Law. My office has not been able to contact Third-Party Defendants in this matter. Therefore, we were not able to obtain Third-Party Defendants’ consent to this request.

Accordingly, Defendants/Third-Party Plaintiffs respectfully request that the Court grant a thirty (30) day extension of time for Defendants/Third-Party Plaintiffs to file their Proposed Findings of Fact and Conclusions of Law, from November 7, 2022 to December 7, 2022.

Thank you for Your Honor's consideration of this request.

Respectfully,

/s/
Wynee Ngo
Assistant Corporation Counsel

cc: **via Mail**
August Physical Therapy, P.C.
Attn: Jonathan August
7235 150th Street, 2H
Flushing, New York 11367

via ECF
All counsel of record.

MEMO ENDORSED


HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 11-4-2022

Defendants'/Third Party Plaintiffs' Proposed
Findings of Fact and Conclusions of Law is due by
December 7, 2022. Third-Party Defendants'
response is due by January 9, 2023.
SO ORDERED.